



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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SUBJECT: 1ST Technical Advisory Committee (TAC) Meeting regarding 9
VAC 25-810 General Virginia Pollutant Discharge Elimination System (VPDES)
Permit for Coin Operated Laundry
TO: TAC Members
FROM: George Cosby, Regulatory Affairs
DATE: July 27, 2009

A TAC meeting was held on July 24, 2009 at DEQ Piedmont Regional Office. The meeting began at 1:30 pm. The TAC members and others attending the meeting were:

Patty Lee	Mr. Bubbles Laundry representative by Telephone
Debra Thompson	DEQ-TRO by Telephone
Eleanore Daub	DEQ- CO
Fred Cunningham	DEQ-CO
Burton Tuxford	DEQ-CO
George Cosby	DEQ-CO

Comments and items presented at the meeting were as follows:

1. The TAC members discussed the renaming of the general permit from Coin Operated Laundries GP to Laundromat General Permit. Also there was a discussion to combine the laundry GP and the Car Wash GP when the Car Wash general permit comes up for reissuance.
2. The TAC members discussed changing the quarterly monitoring requirements to annual monitoring as requested by Patty Lee. Debra Thompson noted there had been minor violations of the general permit for Total Residual Chlorine. Also Debra suggested that TAC members review the permittee reported data sent to Elleanore Daub because there may be discrepancies in how the chlorine data were reported ug/l verses mg/l. Elleanore Daub advised the TAC members that DEQ is proposing to change the monitoring requirements for E. coli in the water quality standards which may require additional samples for geometric mean and the deletion of a maximum sample in this permit. There were concerns about this from the industry since it is a small business and bacteria are not found in high concentrations from this type of discharge. Staff suggested we could adjust the monitoring frequency so there would

be less of an impact on the permittee and that we would also check the effluent guidelines to see if a bacteria limit is required.

3. The TAC members discussed that the registration statement must be submitted with a signature as a hard copy but that the general permit could be sent to the permittee by email. This was acceptable to the group.
4. The TAC members discussed adding sections to the general permit regarding not allowing coverage under this permit when central sewer is available, total maximum daily load (TMDL) language, antidegradation language and a general requirement for no discharge that causes a violation of water quality standards. The central sewer availability language seemed reasonable to all. It was determined that the TMDL language didn't need to be as extensive as that which went into the other general permits. A statement in the authorization to discharge and/or special conditions section that recognizes that the permit limits must meet the requirements of TMDLs might be all that is needed. Staff determined that the antidegradation language from either the non-metallic mineral mining registration statement section or the industrial storm water authorization to discharge section would be appropriate for this permit and it should be placed in the authorization to discharge section. Staff determined that a general recognition of maintenance of water quality standards should be placed in general permits since a reasonable potential analysis for all water quality criteria is not done with general permits. It was determined that these items need further study before they are presented to the TAC members for review.
5. TAC members discussed the revision of the special conditions on quantification and significant digits language.
6. TAC members discussed the need for the enterococci parameter for laundry dischargers to saline waters and agreed that since there are no laundry discharges to saline waters at this time there is no need for this parameter. Debra was requested to contact Mark Sauer, TRO, to determine if he considers there is still a need for the enterococci parameter or a recognition that the permit does not apply to saltwater dischargers.

Items presented at TAC meeting are as follows:

1. 9 VAC 25-810-10 et seq. GENERAL VIRGINIA POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR COIN-OPERATED LAUNDRY
2. VPDES GENERAL PERMIT REGISTRATION STATEMENT FOR COIN OPERATED LAUNDRIES
3. AGENDA TOPICS COIN OPERATED LAUNDRY

I thank the TAC members and others for their service on the TAC.